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**HIDDEN EMPIRE HOLDINGS, LLC;  
HYPER ENGINE, LLC; AND DEON  
TAYLOR; AND THIRD-PARTY  
DEFENDANT ROXANNE TAYLOR**

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

HIDDEN EMPIRE HOLDINGS,  
LLC; a Delaware limited liability  
company; HYPER ENGINE, LLC; a  
California limited liability company;  
DEON TAYLOR, an individual,

Plaintiffs,

vs.

DARRICK ANGELONE, an  
individual; AONE CREATIVE LLC,  
formerly known as AONEE  
ENTERTAINMENT LLC, a Florida  
limited liability company; and ON  
CHAIN INNOVATIONS LLC, a  
Florida limited liability company,

Defendants.

**CASE NO.: 2:22-cv-06515-MWF-AGR**  
(Hon. Michael W. Fitzgerald, Dept. 5A)

**PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION IN LIMINE  
#1 RE FINANCIAL STATUS OF THE  
PARTIES (DKT. # 210)**

Complaint Filed: September 12, 2022  
Trial Date: January 13, 2026

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1           **I.       INTRODUCTION**

2           Defendants’ Motion to preclude references to insurance and the financial  
3 status of the parties is legally unfounded and procedurally defective. Defendants  
4 seek to preclude all references to their financial condition as inadmissible, but  
5 evidence of a party’s financial status is not automatically inadmissible where, as  
6 here, it is relevant to issues of motive, intent, or credibility. Plaintiffs seek to  
7 introduce evidence for these permissible purposes. Additionally, Defendants  
8 failed to identify or argue any undue prejudice under Federal Rules of Evidence  
9 403. Moreover, defense counsel failed to comply with this Court’s Chamber  
10 Rules and Local Rules, requiring a meaningful meet and confer prior to filing this  
11 Motion. Accordingly, the Court should deny this Motion.

12           **II.       FACTUAL CONTENTIONS**

13           On April 26, 2012, Hidden Empire Film Group LLC, an entity affiliated  
14 with HEFG, engaged AONE, an entity owned by Mr. Angelone, to design,  
15 develop and manage HEFG’s websites and related media properties. Mr.  
16 Angelone was compensated for the services he provided to Hyper Engine LLC  
17 and Hidden Empire Film Group. Other than AONE and Mr. Angelone’s work for  
18 Plaintiffs and a law firm in San Bernardino, AONE had no other clients. *See* Ex.  
19 A to Declaration of Felton T. Newell (“Newell Decl.”) at 24:7- 25:13; 27:19-  
20 28:15; 34:6-255.

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1 Mr. Angelone testified in his deposition that since ceasing his work for  
2 Plaintiffs in 2022, his only sources of income have been through his management  
3 of his wife's property and personal loans secured from family. *Id.* at 35:9-11;  
4 35:26-20. Mr. Angelone also testified that he has not held W-2 employment since  
5 2022. *Id.* at 34:6-10.  
6  
7

8 Defendants did not meet and confer with Plaintiffs' counsel prior to filing  
9 this Motion. *Id.* ¶ 3.  
10  
11

### 12 **III. ARGUMENT**

#### 13 **A. Defendants Failed to Meet and Confer Prior to Filing This Motion,** 14 **in Violation of Local Rule 7-3 and This Court's Chamber Rules.** 15

16 The Court's Chamber Rules provide that "[p]rior to filing a motion,  
17 counsel shall comply with the requirement of conference of counsel under L.R. 7-  
18 3." Honorable Michael W. Fitzgerald's Procedures Rules, *Law and Motion*  
19 *Schedule*. The rule strictly requires moving parties to "first contact opposing  
20 counsel to discuss thoroughly, preferably in person, the substance of the  
21 contemplated motion and any potential resolution." C.D. Cal. L.R. 7-3. Courts  
22 routinely deny motions in limine filed without compliance with this rule. *See*  
23 *Johnson v. Nat. Gas Fuel Sys., Inc.*, No. 1:19-CV-00105-SAB, 2024 WL  
24 5047209, at \*6 (E.D. Cal. Dec. 9, 2024) (denying two of the defendant's motions  
25 in limine for "failure to comply with the Court's July 3, 2024 amended pretrial  
26  
27  
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1 order requiring that the parties engage in meaningful, genuine attempts to meet  
2 and confer.”); *see also*, *Halbert v. Cnty. of San Diego*, No. 07CV1607-L (WVG),  
3 2011 WL 13356067, at \*3 (S.D. Cal. June 27, 2011)(denying defendants’ for  
4 failure to comply with its perquisite obligations to meet and confer).  
5

6  
7 Defense counsel neither provided any notice of this Motion nor allowed  
8 defense counsel the opportunity to meaningfully discuss its substance or narrow  
9 its issues.  
10

11 B. Evidence of Defendants’ Financial Condition is Relevant to Rebut  
12 Defendants’ Alleged Breach of Contract and Promissory Fraud  
13 Theories.  
14

15 In their motion, Defendants mischaracterize relevant caselaw to support  
16 their claim that any reference to their financial condition is irrelevant and  
17 inadmissible. Specifically, they cite *Love v. Wolf*, 226 Cal. App. 2d 378, 389 (3rd.  
18 Dist. 1964) for its finding that evidence of wealth or poverty of a party is  
19 inadmissible to the extent it “prove[s] liability or an award for damages.”  
20 However, the *Love* court also held that “no absolute rule of exclusion applies to  
21 prohibit proof of dollars or sales of profit, and when, relevant, evidence thereof  
22 should be admitted.” *Id.* at 390. In *Love*, the court found that, while proof of  
23 Defendant Parke-Davis’ wealth was inadmissible, its “proof of sales . . . was  
24 relevant to show a motive or reason” for Defendants’ overpromotion of a drug,  
25 which was a crucial issue in the case. *Id.* at 389; *see also*, *Herbert v. County of*  
26  
27  
28





1 *San Diego*, 2011 WL 133560 (S.D. Cal. 2011)(denying plaintiff's motion to  
2 exclude evidence of his income tied to his jewelry business because it was  
3 relevant to show potential motive or purpose for plaintiff's resignation from his  
4 employment with Defendant).

5  
6 Similarly here, Plaintiffs intend to introduce evidence of Defendants'  
7 financial condition to rebut the assumption at the core of Defendants' defense that  
8 Plaintiffs wanted to enter into a joint venture or 50/50 partnership with AONE. In  
9 fact, AONE and Mr. Angelone had minimal commercial activity, no meaningful  
10 business assets or client base apart from Defendants' work on Plaintiffs'  
11 marketing campaigns. AONE's lack of commercial viability undermines its  
12 claim that Plaintiffs intended to partner with Defendants or to defraud them.

13  
14  
15 C. Defendants Have Failed to Show Any Unfair Prejudice Under Rule

16  
17  
18 403.

19 Defendants offer no evidence of unfair prejudice to justify the exclusion of  
20 the subject evidence. Federal Rule of Evidence 403 limits the admission of  
21 evidence only where the risk of unfair prejudice *substantially* outweighs its  
22 probative value. *See* Fed. R. Evid. 403 (emphasis added). The evidence that  
23 Defendants seek to exclude here relates to critical issues in the case and directly  
24 supports an inference relevant to an issue. Slight inconvenience to a party that is  
25 inherent in probative evidence is *not* undue prejudice. *See United States v. Abel*,  
26 469 U.S. 45, 50 (1984)("Relevant evidence is inherently prejudicial; but it is  
27  
28





1 only unfair prejudice, substantially outweighing probative value, which permits  
2 exclusion under Rule 403.”); *see also*, *Madrigal v. Allstate Indem. Co.*, No. CV  
3 14-4242 SS, 2015 WL 12746232, at \*3 (C.D. Cal. Oct. 29, 2015), clarified on  
4 denial of reconsideration, No. CV 14-4242 SS, 2015 WL 12748277 (C.D. Cal.  
5 Nov. 5, 2015) (denying plaintiffs’ limine motion because they failed to  
6 demonstrate how admitting the evidence the motion sought to exclude would  
7 result in unfair prejudice, confusion of the issues, undue delay, or the  
8 presentation of cumulative evidence.)  
9  
10  
11

12 Any speculative or conjectural prejudice that could result from the  
13 admission of Defendants’ wealth and financial status is substantially outweighed  
14 by its probative nature.<sup>1</sup>  
15  
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<sup>1</sup> Plaintiffs do not contest the exclusion of information related to insurance coverage.





1           **IV. CONCLUSION**

2           For the foregoing reasons, Plaintiffs respectfully request that the Court  
3  
4 deny Defendants' Motion in Limine #1.

5  
6  
7 Dated: December 9, 2025

**NEWELL LAW GROUP PC**

8  
9 /s/ Felton T. Newell

10  
11 

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Attorneys for Plaintiffs

12 **HIDDEN EMPIRE HOLDINGS, LLC;**  
13 **HYPER ENGINE, LLC; AND DEON**  
14 **TAYLOR; AND THIRD-PARTY**  
15 **DEFENDANT ROXANNE TAYLOR**

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**DECLARATION OF FELTON T. NEWELL**

I, Felton T. Newell, declare as follows:

1. I am a Co-Managing Shareholder at Newell Law Group PC, counsel of record for Plaintiffs in this action. This Declaration is in support of Plaintiffs' Opposition of Defendants' Motion in Limine #1 Regarding Financial Status of the Parties ("Motion").

2. The facts set forth in this declaration are based on my personal knowledge, except where otherwise noted, and, if called to testify, I could and would competently testify thereto.

3. Attached hereto as Exhibit A is a true and correct copy of excerpts of the deposition of Darrick Angelone.

4. Defendants did not meet and confer with Plaintiffs' counsel prior to filing this Motion.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 9, 2025 at Los Angeles, California.

/s/ Felton T. Newell  
Felton T. Newell

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

HIDDEN EMPIRE HOLDINGS, LLC; )  
A DELAWARE LIMITED LIABILITY )  
COMPANY; HYPER ENGINE, LLC; )  
A CALIFORNIA LIMITED )  
LIABILITY COMPANY; DEON )  
TAYLOR, AN INDIVIDUAL, )  
)  
Plaintiffs, )  
)  
vs. ) Case No.  
) 2:22-cv-06515-MWF-AGR  
DARRICK ANGELONE, AN )  
INDIVIDUAL; AONE CREATIVE ) VOLUME I  
LLC, FORMERLY KNOWN AS AONEE ) (PAGES 1 - 194)  
ENTERTAINMENT LLC, A FLORIDA )  
LIMITED LIABILITY COMPANY; )  
AND ON CHAIN INNOVATIONS )  
LLC, A FLORIDA LIMITED )  
LIABILITY COMPANY, )  
)  
Defendants. )  
)

VIDEOTAPED DEPOSITION OF DARRICK ROBERT ANGELONE

LOS ANGELES, CALIFORNIA

WEDNESDAY, MARCH 5, 2025; 9:56 A.M.

Reported by: Izumi Kono  
CSR 14156  
Job No.: 312852



1 UNITED STATES DISTRICT COURT

2 FOR THE CENTRAL DISTRICT OF CALIFORNIA

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4  
5 HIDDEN EMPIRE HOLDINGS, LLC; )  
A DELAWARE LIMITED LIABILITY )  
6 COMPANY; HYPER ENGINE, LLC; )  
A CALIFORNIA LIMITED )  
7 LIABILITY COMPANY; DEON )  
TAYLOR, AN INDIVIDUAL, )

8 Plaintiffs, )

9 vs. )

Case No.

10 2:22-cv-06515-MWF-AGR

11 DARRICK ANGELONE, AN )  
INDIVIDUAL; AONE CREATIVE )  
12 LLC, FORMERLY KNOWN AS AONEE )  
ENTERTAINMENT LLC, A FLORIDA )  
LIMITED LIABILITY COMPANY; )  
13 AND ON CHAIN INNOVATIONS )  
LLC, A FLORIDA LIMITED )  
14 LIABILITY COMPANY, )

VOLUME I

(PAGES 1 - 194)

15 Defendants. )

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22 VIDEOTAPED DEPOSITION OF DARRICK ROBERT  
ANGELONE, VOLUME I, taken on behalf of  
23 the plaintiffs, at 1801 Century Park East,  
25th Floor, Los Angeles, California 90067,  
24 beginning at 9:56 a.m. and ending at 4:22  
p.m., on Wednesday, March 5, 2025, before  
Izumi Kono, Certified Shorthand Reporter  
25 No. 14156.



1 APPEARANCES:

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21 SCALM@KDEKLAW.COM

22 Also Present:

23 JASON PATSALIS, VIDEOGRAPHER  
24  
25



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## INDEX

WITNESS	PAGE
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Darrick Robert Angelone	
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Examination by Mr. Newell	7
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## EXHIBITS

MARKED	DESCRIPTION	PAGE
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Exhibit 1	Judgment	167
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Exhibit 2	2022 E-mails	170
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QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER

PAGE LINE

(None)

INFORMATION REQUESTED

(None)



1 Q And those are the only W-2 arrangements 10:22:37  
2 you're aware that you've had? 10:22:42  
3 A That I can recall sitting here, yes. 10:22:43  
4 Q Okay. Can you recall situations in which 10:22:45  
5 you were paid as an independent contractor? 10:22:50  
6 A Do I recall situations? I do. 10:22:56  
7 Q So which entities did you -- do you 10:22:58  
8 provide services as an independent contractor? 10:23:01  
9 A Some of the entities that I provided 10:23:05  
10 services as to that were to Hidden Empire Film 10:23:08  
11 Group, LLC. I also provided it to Hidden Empire 10:23:12  
12 Film Group, LP. I provided services as an 10:23:17  
13 independent contractor to Meet the Blacks, LLC, is 10:23:25  
14 my recollection of the -- the LLC. I provided 10:23:30  
15 consulting -- sorry -- independent contractor 10:23:38  
16 services to the Traffik movie. I just do not recall 10:23:41  
17 if it was a Traffik entity or if it was Hidden 10:23:47  
18 Empire Film Group. I provided independent 10:23:51  
19 contractor services for Sean Merrick. I provided 10:23:57  
20 independent contractor services for Hollywood Street 10:24:11  
21 King. I have provided independent contractor 10:24:14  
22 services for a law firm in San Bernardino. 10:24:22  
23 Q What's the name of the firm? 10:24:27  
24 A Todd Martinez Law. 10:24:30  
25 AONE provided independent contractor 10:24:45



1 THE WITNESS: As AONE Entertainment before 10:28:57  
2 we effected a name change in 2020, the clients would 10:28:59  
3 have been the same listed as independent contractor 10:29:06  
4 services and would have included Meet the Blacks, 10:29:08  
5 Hidden Empire, LP -- not Hidden Empire Film Group, 10:29:14  
6 LLC, but Hidden Empire Film Group, LP. I provided 10:29:20  
7 services for the same, virtually, which became 10:29:27  
8 Hidden Empire Holdings, LLC. 10:29:31

9 I don't -- I don't -- I'm not sure. 10:29:36  
10 Otherwise, any -- I don't recall anything -- any 10:29:42  
11 other specific instances. 10:29:46

12 BY MR. NEWELL: 10:29:49

13 Q Well, the question is do you recall any 10:29:49  
14 other specific clients. 10:29:50

15 A Right. Instances being clients, I don't. 10:29:53

16 MR. FOX: Just for clarity, meaning all 10:30:00  
17 the names that you've already mentioned that your 10:30:02  
18 company did work for? 10:30:05

19 I'm a little unclear. Sorry. 10:30:07

20 BY MR. NEWELL: 10:30:09

21 Q Yeah. Just to clarify -- so you mentioned 10:30:10  
22 a series of companies: Hidden Empire Film Group, 10:30:13  
23 LLC; Hidden Empire Film Group, LP; Meet the Blacks, 10:30:19  
24 LLC; Traffik -- whichever entity was the owner of 10:30:23  
25 Traffik, the movie; Sean Merrick. So you mentioned 10:30:32



1 those clients. 10:30:36

2 Are there any other clients, sitting here 10:30:38

3 today, that you can recall, that AONE Creative has 10:30:42

4 had? 10:30:45

5 A Not beyond those that I've already listed. 10:30:47

6 They also include the Todd Martinez Law; Hidden 10:30:51

7 Empire Holdings; Traffik, an entity for the Traffik 10:30:56

8 film that may have been Hidden Empire Film Group, 10:30:59

9 LP; Sean Merrick; Hollywood Street King; Meet the 10:31:04

10 Blacks, LLC. I don't recall anything more than 10:31:10

11 we've discussed thus far. 10:31:21

12 Q You mentioned a corporate name change 10:31:23

13 in -- 10:31:23

14 Was it 2020? 10:31:26

15 A Yes. 10:31:27

16 Q What was the change from and to? 10:31:27

17 A The change -- the name was changed with 10:31:29

18 the Secretary of State in Florida from AONE 10:31:33

19 Entertainment, LLC to AONE Creative, LLC. 10:31:37

20 Q Why did you make that change? 10:31:41

21 A As I recall, it was just to bring the 10:31:46

22 branding more in line with what we were doing at 10:31:52

23 that point. 10:32:00

24 Q And when I've asked about clients of AONE 10:32:00

25 Creative -- and you've given us a list of clients -- 10:32:06



1 employment? 10:40:50

2 A I'm employed by AONE Creative. 10:40:54

3 Q So you've been employed by AONE Creative 10:40:57

4 since 2022? 10:41:00

5 A And prior. 10:41:01

6 Q And prior. Any other employment during 10:41:02

7 that time -- after 2022? 10:41:05

8 MR. FOX: Objection. Relevance. 10:41:07

9 You can answer. 10:41:08

10 THE WITNESS: W-2 employment, just to 10:41:09

11 specify? 10:41:12

12 BY MR. NEWELL: 10:41:13

13 Q Yes. 10:41:14

14 A No. 10:41:15

15 Q You described earlier clients of AONE 10:41:18

16 Creative. 10:41:27

17 Can you describe the AONE Creative clients 10:41:27

18 since the time when AONE stopped providing services 10:41:31

19 to Hidden Empire in 2022? 10:41:37

20 MR. FOX: Objection. Calls for trade 10:41:39

21 secrets. 10:41:41

22 You can answer. 10:41:41

23 THE WITNESS: As I recall, it would have 10:41:42

24 been Todd Martinez Law is in that timeframe, 10:41:52

25 post-2022. I don't recall -- I don't recall any 10:41:55



1 other clients with the exception of Todd Martinez 10:42:24

2 Law. 10:42:27

3 BY MR. NEWELL: 10:42:36

4 Q Other than AONE Creative, have you had any 10:42:36

5 other personal sources of income since 2022? 10:42:40

6 MR. FOX: Objection. Privacy. Objection. 10:42:43

7 Relevance. 10:42:45

8 You can answer. 10:42:45

9 THE WITNESS: I manage personally a 10:42:46

10 property owned by my wife and myself in Palm 10:42:52

11 Springs, California. 10:42:58

12 BY MR. NEWELL: 10:43:04

13 Q Any other sources of income? 10:43:05

14 MR. FOX: Same objection. 10:43:06

15 You can answer. 10:43:07

16 THE WITNESS: Personal sources of income 10:43:08

17 outside of that and AONE? Family. 10:43:12

18 BY MR. NEWELL: 10:43:27

19 Q So family members have given you money? 10:43:28

20 A I've had -- I've secured loans. 10:43:30

21 Q Any other sources of income? 10:43:41

22 MR. FOX: Same objection. 10:43:44

23 THE WITNESS: Our -- I'm married. Our 10:43:47

24 household income -- my wife provides to the 10:43:51

25 household. 10:43:53



1       STATE OF CALIFORNIA                                 )  
  ) ss:  
2       COUNTY OF VENTURA                                 )

3

4                       I, Izumi Kono, do hereby certify:

5                       That I am a duly qualified Certified  
6       Shorthand Reporter, in and for the State of  
7       California, holder of certificate number 14156,  
8       which is in full force and effect and that I am  
9       authorized to administer oaths and affirmations;

10                      That the foregoing deposition testimony of  
11       the herein named witness was taken before me at the  
12       time and place herein set forth;

13                      That prior to being examined, the witness  
14       named in the foregoing deposition was duly sworn or  
15       affirmed by me to testify the truth, the whole  
16       truth, and nothing but the truth;

17                      That the testimony of the witness and all  
18       objections made at the time of the examination were  
19       recorded stenographically by me and were thereafter  
20       transcribed under my direction and supervision;

21                      That the foregoing pages contain a full,  
22       true and accurate record of the proceedings and  
23       testimony to the best of my skill and ability;

24                      I further certify that I am not a relative  
25       or employee or attorney or counsel of any of the



1 parties, nor am I a relative or employee of such  
2 attorney or counsel, nor am I financially interested  
3 in the outcome of this action;

4 That if the foregoing pertains to the  
5 original transcript of a deposition in a federal  
6 case, before completion of the proceedings, review  
7 of the transcript{x} was { } was not required.

8  
9 IN WITNESS WHEREOF, I have subscribed my  
10 name this \_\_\_\_\_ day of \_\_\_\_\_,  
11 \_\_\_\_\_.

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17 IZUMI KONO, CSR No. 14156  
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